

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, et al. individually and on behalf of all others similarly situated,  <i>Plaintiffs,</i>  v.  BROWN UNIVERSITY, et al.,  <i>Defendants.</i>	Case No. 1:22-cv-00125  Hon. Matthew F. Kennelly
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**DECLARATION OF DAVID GRINGER IN SUPPORT OF CERTAIN DEFENDANTS’  
MOTION TO COMPEL RESPONSES TO DEFENDANTS’ SECOND SET OF  
INTERROGATORIES**

I, David Gringer, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been admitted *pro hac vice* before this Court. I am an attorney at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP and am counsel for Defendant The Trustees of the University of Pennsylvania. I submit this Declaration on behalf of California Institute of Technology, Cornell University, Georgetown University, The Johns Hopkins University, Massachusetts Institute of Technology, the University of Notre Dame, and the Trustees of the University of Pennsylvania (collectively, “Defendants”), and in support of Defendants’ Motion to Compel Responses to Defendants’ Second Set of Interrogatories. This Declaration is based on my personal knowledge and review of the attached Exhibits.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff Andrew Corzo’s Responses and Objections to Defendants’ Second Set of Interrogatories, dated October 30, 2023.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff Sia Henry’s Responses and Objections to Defendants’ Second Set of Interrogatories, dated October 30, 2023.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff Alexander Leo-Guerra's Responses and Objections to Defendants' Second Set of Interrogatories, dated October 30, 2023.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiff Michael Maerlender's Responses and Objections to Defendants' Second Set of Interrogatories, dated October 30, 2023.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff Brandon Piyevesky's Responses and Objections to Defendants' Second Set of Interrogatories, dated October 30, 2023.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Plaintiff Benjamin Shumate's Responses and Objections to Defendants' Second Set of Interrogatories, dated October 30, 2023.

8. Attached hereto as **Exhibit 7** is a true and correct copy of Plaintiff Brittany Tatiana Weaver's Responses and Objections to Defendants' Second Set of Interrogatories, dated October 30, 2023.

9. Attached hereto as **Exhibit 8** is a true and correct copy of Plaintiff Cameron Williams' Responses and Objections to Defendants' Second Set of Interrogatories, dated October 30, 2023.

10. Attached hereto as **Exhibit 9** is a true and correct copy of a November 8, 2023 letter from Defendants' counsel to Plaintiffs' counsel memorializing the substance of two meet-and-confer discussions between the parties, which took place on November 6 and November 7, 2023.

11. Attached hereto as **Exhibit 10** is a true and correct copy of email correspondence between Defendants' counsel and counsel for Plaintiffs related to the parties' meet-and-confer

discussions regarding Plaintiffs' discovery responses, including a November 9, 2023 email from Plaintiffs' counsel responding to Defendants' November 8, 2023 meet-and-confer letter.

12. Attendees at the meet-and-confer calls held on November 6 and 7, 2023 included, but were not limited to: for Defendants, David Gringer and Christopher Yook, and for Plaintiffs, Ted Normand and Richard Cipolla.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15 day of November 2023, at Philadelphia, Pennsylvania.

/s/ David Gringer

David Gringer